GIBBONS P.C.

January 8, 2020

MILMO ENDORSED

HUSDO SPAY CUMMENT

Page 2

- On December 18, 2019, Citigroup sought, with Petitioner's consent, a second extension of the briefing schedule, until January 8, 2020, because undersigned counsel's primary in-house contact at Citigroup concerning this matter was attending to a serious illness of an immediate family member. Your Honor granted that request for an extension on December 18, 2019.
- 4. Since December 18, 2019, and despite numerous attempts, we have not been able to reach the in-house contact at Citigroup from whom we receive instructions with respect to this matter, and we have been advised of no other individual at Citigroup from whom we may take instructions concerning this matter. We currently do not know whether our inability to reach our in-house contact at Citigroup relates to the serious illness of his immediate family member.
- 5. Under the circumstances, we seek to reserve Citigroup's rights and defenses in this miscellaneous action and request a further extension of time until January 29, 2020 to confer with our client concerning its response to the Motion to Compel and respond to the Motion accordingly.
- 6. Petitioner's counsel consents to this request for an extension of time in accordance with the proposed briefing schedule set out below.

Accordingly, Citigroup respectfully requests that the Court approve the following briefing schedule on Petitioner's Motion to Compel:

Citigroup shall file its response to Petitioner's Motion to Compel on or before (a) January 29, 2020; and

(b) Petitioner may file its reply, if any, on or before February 17, 2020.

Please have a member of your staff contact the undersigned should the Court have any questions.

Grated

Respectfully submitted,

Daniel S. Weinberger

All counsel of record (via ECF) cc: